

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA *ex rel.*
Michael George Daggett,

Plaintiff,

v.

Regional Toxicology Services, LLC d/b/a Sterling
Reference Laboratories and Rocky Mountain Tox,
LLC d/b/a Cordant Health Solutions,

Defendants.

CASE NO. C15-5565-MJP

JOINT STIPULATION OF DISMISSAL

Noted for Consideration on:
October 21, 2020

Pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure and the *qui tam* provisions of the False Claims Act, 31 U.S.C. § 3730(b)(1), and in accordance with and subject to the terms and conditions of the Settlement Agreement (“Settlement Agreement”) and supplemental Side Letter signed by the United States; Sterling Healthcare Opco, LLC d/b/a/Cordant Health Solutions, acting as the corporate parent of Regional Toxicology Services, LLC and Rocky Mountain Tox, LLC (“Defendants”); and Relator Michael George Daggett, the United States and the Relator hereby stipulate, through their undersigned counsel, to the entry of an order dismissing the Complaint in its entirety *with* prejudice as to the Relator, and *with* prejudice to the United States only to the extent of the “Covered Conduct,” as that term is defined in the Settlement Agreement, and with respect to

1 Defendants, (“Parties”) only but otherwise *without* prejudice to the United States.

2 2. The dismissal is without prejudice to any rights that any party may have under the
3 Agreement, including the government’s right, in the event of default, to rescind the Agreement and
4 bring any civil and/or administrative claim, action, or proceeding against Cordant and/or any of its
5 subsidiaries.

6 3. Relator agrees that the amount and terms of the Settlement Agreement are fair,
7 adequate, and reasonable pursuant to 31 U.S.C. § 3730(c)(2)(B).

8 4. The Parties request that the Court retain jurisdiction over the matter to enforce the
9 terms of the Settlement Agreement, should that become necessary.

10 5. The Parties further request that the Court enter an order in the form of the
11 accompanying proposed order.

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1 Dated this 21st day of October, 2020.

2 Respectfully submitted,

3 TESSA M. GORMAN

4 Attorney for the United States, Acting Under Authority
5 Conferred by 28 U.S.C. § 515

6 s/ Kayla C. Stahman

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